

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
EUGENE M. ZVOLENSKY : **CASE NO. 1-15-05094-MDF**
:
Debtor :

ANSWER TO TRUSTEE'S MOTION TO DISMISS

Comes Now, Debtor, Eugene M. Zvolensky, by and through his counsel,
Lisa A. Rynard, Esquire, and Answers the Trustee's Motion to Dismiss, as follows:

1. Admitted.
2. Admitted.
3. Admitted.

4. Denied. The Debtor is awaiting acceptance of an offer to resolve a Motion for Relief through an amended plan. The mortgage lender at issue is Debtor's only creditor being addressed through the plan and as such Debtor denies the delay prejudices creditors. Strict proof otherwise is demanded at hearing.

WHEREFORE, Debtor respectfully requests this Honorable Court Deny the Chapter 13 Trustee's Motion to Dismiss Debtor's case.

Respectfully submitted,

Purcell, Krug & Haller

By: /s/ Lisa A. Rynard
Lisa A. Rynard, Esquire
1719 N. Front Street
Harrisburg, Pa 17102
717-234-4178
lrynard@pkh.com

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